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JAN 13 1994

In the matter of PR Docket 93-267

Jim Lawyer

AA5QX

178 Sunset Drive
Murphy, TX 75094

Secretary
FCC
Washington, DC 20554

Dear Sir,

I am writing to urge you to consider the effects of PR 93-267 on the Amateur Radio Service and not inact this rule. My comments are based on having been involved in radio communications for over thirty years in the commercial, private, and amateur services. I received my first FCC license in 1966, my First Class Radiotelephone License in 1968, my Novice Class Amateur license in 1988, and my Extra Class license in 1990. I am an accredited VE under both W5YI and the ARRL/VEC and actively participate in the Radio Amateur Civil Emergency Service as an Assistant Radio Officer for training and Assistant Net Control Station.

I have witnessed tremendous changes in society at large and in the operations of the Federal Communications Commission over the past thirty years, but nothing I have seen carries with it the potential for harm of this proposed rule. The very core of the Amateur Radio Service is its self-policing. By regulation Hams are not permitted to communicate with unlicensed operators and the responsibility for compliance rests on each individual licensee's shoulders. Compliance is only possible due to the fact that over the air identification by call sign contains three key elements. The call signs are unique, follow a well established format, and are easily verifiable. All three of these elements will be destroyed by the instant licensing proposed under 93-267.

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Under PR 93-267 two of the three key elements of amateur radio licensing, the uniqueness of the call signs and the ability to verify them, will be destroyed. Any attempt to modify the instant licensing proposal to address these issues will destroy the third element, the uniformity of format and progression.

EACH CALL SIGN IS UNIQUE. There is only one AA5QX and the bearer of that license can be quickly identified. Under the proposed rule that will no longer be the case. There can easily be several people with the same initials in the same VEC geographic area. John S. Smith, Juan S. Sierra, and Jane S. Simmons will all be authorized to use WZ5JSS. Therefore, there will be multiple call signs of equal legitimacy. Who actually has the right to use that call sign, it will be impossible to tell.

CALL SIGNS CAN BE VERIFIED. There are multiple sources for information on who a particular call sign has been issued to and what call sign series are being issued at this time. There are callbooks, computer bulletin boards, newsletters, databases, and hobby magazines that carry who's who and what call signs have been issued to date. Given allowances for the dated nature of these sources, it remains relatively simple to determine that a new ham who "just received" his license is bogus if he uses KB5GSS since that series was exhausted years ago. WZ5JSS would simply never be verifiable, nor would any other instant license call sign.

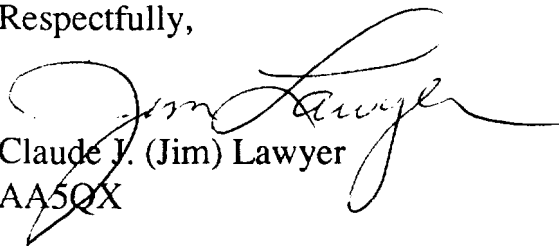
CALL SIGNS FOLLOW AN ESTABLISHED PROGRESSION AND FORMAT. Call signs are created using different formats to designate class of license and geographical area of issuance. This provides a quick and easy litmus test for new calls heard. A new ham licensed and living in Dallas will not normally be issued an 8 district call nor will he or she be issued a call from a previous series such as WD or KB. Call signs are obviously not legitimate if they do not follow the established formats. There are no American Amateur call signs that are three letters followed by four number for instance, nor are there new call signs in some districts that are one by two since those have been exhausted. Any "special format" call signs would have a serious negative impact on this element of licensing.

The critical point of this matter is that the integrity of the radio service is in jeopardy with the proposed rule change. While it may postpone some requests for the status of original licenses, most will still want to know when their "real" call sign is going to be issued, and certainly nothing in the "instant license" provision deals with the numerous inquiries regarding upgrades and relocations of already licensed operators. There is really nothing to be gained by the change.

What should be done then? It appears that the situation will be resolved or at the very least mitigated by the proposed on line computer system that has been announced. Computer transfer of test results and pertinent information by the VECs will greatly reduce the commission manpower requirements and turnaround time for licenses. All of this without muddying the waters with multiple temporary callsigns and the attendant problems.

My position is not based upon traditions, antiquated practices, or prejudices but on practicality and the fact that you have already put in place a system that can resolve the problem. For the sake of the Amateur Radio Service and the citizens it serves, I urge you to retain the integrity of the present call sign system and disallow this proposal.

Respectfully,



Claude J. (Jim) Lawyer
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